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## MEMORANDUM

TO:

The Record

FROM:

Floyd D Nichols, Chiefd A. Response Section (Signature)

Visit to Removal Sites in and Around Salt Lake City and SUBJECT:

Participation in July 1988 UDOH Superfund Monthly

Meeting

## Site Visits:

- Richardson Flats. Viewed Richardson Flats Proposed NPL Site 1. from US Hwy 40 which runs past the site on the north. main part of the tailings pile appeared to have been covered with dirt being hauled from a nearby borrow pit. At time of visit, two approximately 12 cy rear-dump trucks were hauling borrow from a pit just south of the site and dumping the dirt in piles onto the top on the tailings. A front end loader was filling the trucks in the borrow pit. Appearances suggest that the loader was occasionally brought to the tailings to spread the dirt into a 3" - 4" tailings (At a recent office visit by representatives of United Park City Mines, we were told by them that they were in the process of covering the tailings with dirt pursuant to stipulations in an NPDES Permit issued to them by the State of Utah.) None of the tailings appeared to be suspended in the air by the light easterly winds occurring at the time.
- Livingston Drums. Drove into the site through the shoulder 2. high corn, across a cable laying in the dirt at the entrance. The fence around the trailers appeared to be intact and secure. At least three children, ages approximately 11-13, were watching me from the dilapidated buildings of the old homestead just northwest of the fenced
- Sharon Steel. Drove on city streets around the site. 3. apparent activities taking place on the site.
- 4. Midvale Slag. Drove on city streets around the site. Normal slag selling operations in progress on the east side along the Jordan River. A well drilling crew was apparently installing shallow wells in the open field near the northeast corner of the slag pile.

- 5. Portland Cement North Site. Drove on city streets around site. Some of the PRP-posted warning signs were laying in the dirt and/or so weatherworn that the writing was unreadable. The cable was in place across the main entrance to the site off of Redwood Road but was not locked in place. The surface of the kiln dust pile had many vehicle and foot tracks apparent from the adjacent roadways. There was no surface crusting apparent on the surface of the kiln dust which would suggest a recent application of dust suppressant (a remote observation only as I did not attempt direct site entry). There was no apparent suspension of dust particles in the air due to the light winds occurring at the time.
- 6. Portland Cement - South Site. Drove on Redwood Road along the east side of the site and on the SLC Industrial Canal access road along the southwest side of the site. As with the north site, some of the warning signs were laying in the dirt, some were so washed out as to be unreadable, and some were facing in to the site rather than out to the surrounding properties. The cable chain across the main access road to the site off Redwood Road was laying in the dirt. Truck and foot tracks in the dirt at the Redwood Road turnoff indicate that this entrance to the site is in routine use. While I observed the site entrance from across the street, a truck filled with apparently reconditioned 55gallon drums exited the site. The operating business adjacent to the site is Beehive Barrel & Drum. Apparently customers and/or employees of Beehive routinely use the site entrance road for access to 'backyard areas' of the business. Site surface conditions appeared the same as that reported above for the North Site.
- 7. Military Salvage Yard. Drove passed the site on Beck Street. Site is an elongated rectangle between the Amoco Refinery (west side) and Beck Street (east side), address approximately 1250 North Beck. From the street the site appears to be a typical junk yard that has been out of business for some time. A neighborhood bar and a small commercial operation bound the site to the south and north respectively. The site had a "For Sale" sign posted by a local realtor. (This site was subsequently entered for an initial inspection by Don Shosky, OSC, the following day.) Based on preliminary information passed to EPA by the UDOH, PCBs and/or other suspected hazardous wastes may be present on site. Initial inspection should be followed up with a detailed sampling investigation.

- 8. Petrochem Recycling Corp. Drove by facility located at 1628 N. Chicago on city street. Facility was identified by UDOH for possible Removal action two months ago (at the time the facility was still in operation). The facility appears closed and temporary fencing has been erected along the entire street frontage. No apparent activity was taking place at the facility. The facility gave some appearance of vandalism. Soils around and throughout the process areas appear heavily saturated with slopped chemicals. Follow-up with UDOH will be scheduled.
- American Barrel. PRP erection of perimeter fence around the site pursuant to the UAO appeared to be almost completed. Construction crews from Sentry Fence Co. appeared to be finishing the fabric/post ties. Entry gates were not yet in place. Observed crew members were apparently working in Tyvek booties and no other special body protection. No decon area or implements for personnel or equipment could be identified.

## Meeting with UDOH:

Jay Silvernale stayed for the late afternoon meeting. Kent Gray wanted to review status of:

1. Richardson Flats. Gave Kent a rundown on our conversation with the representatives of United Park City Mines ('UPC'). Told him that UPC was covering the Richardson Flats tailings with borrow from a nearby pit pursuant to, they thought, a stipulation in an NPDES Permit issued by UDOH. Kent got a copy of the 9/28/87 Permit and it was, in fact, issued by the Region. Kent, who had driven past the site the previous weekend, and I agreed that it appeared UPC was applying approximately four inches of soil to the tailings.

UDOH is not currently monitoring the site except for an occasional drive-by. Kent also stated that the State is still contemplating taking the lead role for this site. Jay confirmed that his Section currently has no spare RPM to be assigned to the site. Therefore, Remedial will not be scheduling any site actions for an indefinite period of time. Upon questioning, I told Kent that we were attempting to complete Action Memo paperwork by early October 1988, with plans to complete the site remediation - through delisting - by the end of FY89. Kent didn't have any pointed reaction except to ask that we coordinate closely with Jim Martin of his staff.

- 2. Wasatch Plaza. UDOH wants to make a presentation before the Sugarloaf Community Council at their regularly scheduled meeting on 8/3/88. Kent would like to tell the Council that the dirt at the Plaza site will be removed and not just covered. To that end, UDOH is to send a letter to Bob Duprey giving the UDOH rationale for classifying the Plaza wastes as other than an 'F' waste. He feels that, if we can agree to that classification, we will be able to remediate the site through soil removal to USPCI rather that stabilizing the site through capping. I told Kent that we would consider his letter when it arrived, and that it would take us at least three months to redirect our efforts. He didn't feel that the Council would be upset at the time delay if they new that the dirt would be eventually hauled off.
- 3. Portland Cement. Kent was interested in my observations at the site earlier in the day. He recalled that ERB had been involved with assisting the UDOH with site assessment and PRP negotiations two and four years ago. I told Kent that ERB was not interested in being again invited by the State to assist with PRP negotiations then being invited to leave whenever the State has cut a deal with the PRPs and pre-exclude further EPA action. Kent explained that he was interested in seeing something constructive happen now.

I suggested to Kent that the kiln dust should be either moved out of town or capped in place while awaiting removal. I told him it was my opinion that leaving the dust piles in their present state was not acceptable. Kent agreed and asked our next step. I suggested that ERB would begin construction of a PEA in the very near future. Kent asked to be kept informed of our actions.

- 4. Xtron. Kent wanted to discuss the issue of cleanup levels at the Blanding site. I essentially deferred the conversation to Jim Knoy.
- 5. Petrochem Recycling. The day ended before Kent and I had an opportunity to discuss this site. However, during a follow-up phone call, Kent explained that, according to his information, all tanks and drums at the site had been emptied before the facility had shut down. He went on to state that the PRP had approached the State for permission to reopen with a RCRA TSD permit. UDOH is currently evaluating that request. He will let me know more later.

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